

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, THE ESTATE  
OF CHERRIGALE TOWNSEND and THE HELEN  
CHRISTINE TOWNSEND MCDONALD TRUST

*Plaintiffs,*

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED  
SHEERAN, ATLANTIC RECORDING  
CORPORATION, d/b/a ATLANTIC RECORDS,  
SONY/ATV MUSIC PUBLISHING, LLC, and  
WARNER MUSIC GROUP CORPORATION, d/b/a  
ASYLUM RECORDS

*Defendants.*

ECF CASE

17-cv-5221 (LLS)

**REPLY DECLARATION OF  
DONALD S. ZAKARIN IN  
FURTHER SUPPORT OF  
DEFENDANTS' NINTH  
MOTION *IN LIMINE***

I, DONALD S. ZAKARIN, declare as follows:

1. I have personal knowledge of, and am fully familiar with, the facts set forth in this Reply Declaration, which I respectfully submit in further support of the Ninth Motion *In Limine* filed by Defendants Edward Christopher Sheeran (“Sheeran”), Atlantic Recording Corporation (“Atlantic”) and Sony/ATV Music Publishing LLC (n/k/a Sony Music Publishing (US) LLC) (“SMP,” together with Atlantic and Sheeran, the “Defendants” and each a “Defendant”).

2. Annexed as **Exhibit D** is a copy of Sheeran’s Responses & Objections To Plaintiffs’ First Requests For Production, which Defendants served on November 13, 2017.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 30, 2023



DONALD S. ZAKARIN